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VIA ECF AND EMAIL (LHG_ORDERS@NJD.USCOURTS.GOV)

The Honorable Lois H. Goodman
United States Magistrate Judge
U.S. District Court for the District of New Jersey
Clarkson S. Fisher Federal Building & Courthouse
402 East State Street
Trenton, New Jersey 08608

**Re: *In re Valeant Pharmaceuticals International, Inc. Securities Litigation*
*Master File No. 15-7658 (MAS) (LHG)***

Dear Judge Goodman:

This firm represents Defendants Jeffrey W. Ubben; ValueAct Holdings, L.P.; ValueAct Capital Master Fund, L.P.; VA Partners I, LLC; ValueAct Capital Management L.P.; and ValueAct Co-Invest Master Fund, L.P. (collectively, the "ValueAct Defendants") in the above-referenced matter. Enclosed please find a copy of the following, submitted on the ValueAct Defendants' behalf:

1. Declaration of Allen W. Burton in support of Application for admission *pro hac vice*;
2. Declaration of Jonathan Rosenberg in support of Application for admission *pro hac vice*;
3. Declaration of Margaret L. Carter in support of Application for admission *pro hac vice*;
4. Declaration of Dimitri D. Portnoi in support of Application for admission *pro hac vice*;
5. Proposed form of Consent Order granting admission of counsel *pro hac vice*; and
6. Certification of service.

The ValueAct Defendants submit this application with the consent of Plaintiffs' lead counsel. If Your Honor finds the enclosed proposed order acceptable, we respectfully request that it be entered.

Respectfully submitted,



Allen W. Burton

AWB

cc: All Counsel of Record (via ECF and email)

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